

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Robert J. Grib	<u>Debtor</u>	CHAPTER 13
Specialized Loan Servicing LLC	<u>Movant</u>	
vs.		NO. 17-13911 MDC
Robert J. Grib	<u>Debtor</u>	
Bernadette Grib	<u>Co-Debtor</u>	11 U.S.C. Sections 362 and 1301
William C. Miller, Esq.	<u>Trustee</u>	

**STIPULATION**

AND NOW, it is hereby stipulated and agreed by and between the undersigned as follows:

1. The post-petition arrearage on the mortgage held by the Movant on the Debtors' residence is **\$4,245.76**, which breaks down as follows;

Post-Petition Payments:	September 2017 through November 2017 at \$2,066.39/month
Suspense Balance:	\$1,953.41
<b>Total Post-Petition Arrears</b>	<b>\$4,245.76</b>

2. The Debtor shall cure the aforesaid arrearage while maintaining ongoing post-petition contractual mortgage payments, in the following manner:

- a). Beginning on December 1, 2017 and continuing through May 31, 2018, until the arrearage is cured, Debtor shall maintain, and pay when due, the regular post-petition contractual monthly payments of **\$2,066.39** on the mortgage (or as adjusted pursuant to the terms of the mortgage) which payments are due on or before the first (1<sup>st</sup>) day of each month (with late charges assessed after the 15<sup>th</sup> of the month), plus Debtor shall pay an installment payment of **\$707.63** towards the arrearage on or before the last day of each month;

b). Debtor shall maintain contractual monthly mortgage payments thereafter;

c). The current payment address for the mailing of payments is as follows:

Specialized Loan Servicing  
P.O. Box 636007  
Littleton, Colorado 80163

3. Should Debtor provide sufficient proof of payments made (front & back copies of cancelled checks and/or money orders), but not credited, Movant shall adjust the account accordingly.

4. In the event that the payments under Section 2 above are not tendered pursuant to the terms of this stipulation, Movant shall notify Debtor and Debtor's attorney of the default in writing and Debtor may cure said default within FIFTEEN (15) days of the date said notice. If Debtor should fail to cure the default within fifteen (15) days, Movant may file a Certification of Default with the Court, upon which the Court shall enter an Order granting Movant relief from the automatic stay as to the mortgaged property, and waiving the stay provided by Bankruptcy Rule 4001(a)(3), which the parties hereby agree to waive with respect to said Order. The Order shall be in the form set forth in the proposed form of order filed by Movant within its instant Motion for Relief, or in a form substantially similar. ("Movant" in this paragraph and hereinafter refers to Movant or to any of its successors or assignees, should the claim be assigned or transferred.)

5. If the case is converted to Chapter 7, Movant shall file a Certification of Default with the court and the court shall enter an order granting Movant relief from the automatic stay.

6. If the instant bankruptcy is terminated by either dismissal or discharge, this agreement shall be null and void, and is not binding upon the parties.

7. The provisions of this stipulation do not constitute a waiver by Movant of its right to seek reimbursement of any amounts not included in this stipulation, including fees and costs, due under the terms of the loan, mortgage and applicable law.

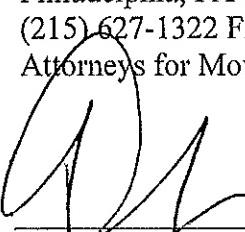
8. The undersigned seeks court approval of this stipulation.

9. The parties agree that a facsimile signature shall be considered an original signature.

Date: November 8, 2017

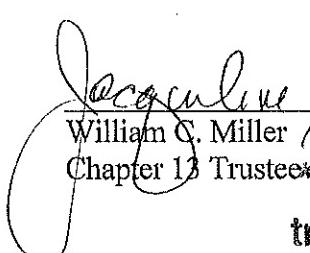
By: /s/ Matteo S. Weiner, Esquire

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\_\_\_\_\_  
Daniel T. McGrory  
Attorney for Debtor(s)

Date: \_\_\_\_\_

Date: 12/12/17

  
\_\_\_\_\_  
William C. Miller  
Chapter 13 Trustee  
**without prejudice to any  
trustee rights or remedies**

Approved by the Court this \_\_\_\_ day of \_\_\_\_\_, 2017. However, the court retains discretion regarding entry of any further order.

Hon. Magdalene D. Coleman  
United States Bankruptcy Judge